

EXHIBIT A

Maria L. Nixon

From: Molshree Gupta
Sent: Wednesday, April 12, 2023 9:25 AM
To: Thomas Ferlauto
Cc: Spencer Carter; Patrick Stockalper; Maria L. Nixon
Subject: RE: 610-2: Assiff, Joshua vs. County of Los Angeles, et al.

Good morning:

I very recently learned that Sgt. Kelly is currently out on medical leave. I am trying to get more info on his return date from the County, but that one likely cannot proceed as currently noticed.

On the County NOD, you have two conflicting dates listed. 4/25 does not work for me, and I will need to check with the County re 4/26.

- Relatedly, please advise your availability to meet and confer about category no. 9 (compliance with the Settlement Agreement entered in USDC Case No. CV-15-03174).
- As you know, this matter arises out of the Santa Clarita Valley LASD station, not the Antelope Valley stations.

Thanks,



Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP

From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Tuesday, April 11, 2023 3:53 PM
To: Molshree Gupta <mgupta@kmslegal.com>
Cc: Spencer Carter <scarter@kmslegal.com>; Patrick Stockalper <pstockalper@kmslegal.com>
Subject: Re: 610-2: Assiff, Joshua vs. County of Los Angeles, et al.
Importance: High

Counsel:

What would you like to do with the depositions of Kelly and COLA? Do you want to keep them as currently set? Or schedule them for a more convenient date?

We would be willing to do Kelly's deposition on a Saturday 4/22, 4/29 or 5/6 if that would work with the Sergeant's calendar.

Please let me know.

Thanks,

Tom

LAW OFFICE OF
THOMAS M. FERLAUTO
A Professional Law Corporation

Direct Dial 310-849-7554

25201 Paseo de Alicia, Suite 270
Laguna Hills, CA 92653
Phone: 949-334-8650
Facsimile: 949-334-8691

Email: TMF@lawofficeTMF.com
Website: www.lawofficeTMF.com

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On Apr 10, 2023, at 9:31 AM, Molshree Gupta <mgupta@kmslegal.com> wrote:

Counsel:

We are not in receipt of all documents that Plaintiff indicated he would produce more than a month ago. Please advise as to status of the further document production, or, in the alternative, advise re your availability for a Zoom or phone meet and confer in the upcoming week.

Thanks,
<image001.jpg>

Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP
841 Apollo Street, Suite 100
El Segundo, California 90245
424-397-1504 – Direct No.
424-217-3026 – Main No. (Ext. 1069)
424-367-0384 – Direct Fax No.
mgupta@kmslegal.com
www.kmslegal.com

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<Pltf Resp. to RFP#1 by Def COLA.pdf>